

Case No. 3:21-cv-00881-X

HIGHLAND CAPITAL MANAGEMENT, L.P.,

Plaintiff,

VS.

HIGHLAND CAPITAL MANAGEMENT FUND  
ADVISORS, L.P.,

Defendant.

HIGHLAND CAPITAL MANAGEMENT, L.P.,

Plaintiff,

VS.

NEXPOINT ADVISORS, L.P., JAMES  
DONDERO, NANCY DONDERO, AND  
THE DUGABOY INVESTMENT TRUST,

Defendants.

HIGHLAND CAPITAL MANAGEMENT, L.P.,

Plaintiff,

VS.

HIGHLAND CAPITAL MANAGEMENT  
SERVICES, INC., JAMES DONDERO,  
NANCY DONDERO, AND THE DUGABOY  
INVESTMENT TRUST,

Defendants.

HIGHLAND CAPITAL MANAGEMENT, L.P.,

Plaintiff,

vs.

HCRE PARTNERS, LLC (n/k/a NexPoint  
Real Estate Partners, LLC), JAMES  
DONDERO, NANCY DONDERO, AND  
THE DUGABOY INVESTMENT TRUST,

Defendants.

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Adv. Proc. No. 21-03007-sgj

Case No. 3:21-cv-00881-X

**NOTICE OF ATTORNEYS' FEES CALCULATION  
AND BACKUP DOCUMENTATION OF HAYWARD PLLC**

**PLEASE TAKE NOTICE** that Highland Capital Management, L.P. (“Highland” or “Plaintiff”), the reorganized debtor in the above-captioned chapter 11 case (the “Bankruptcy Case”) and plaintiff in the above-referenced adversary proceedings (the “Adversary Proceedings”), hereby files this *Notice of Attorneys’ Fees Calculation and Backup Documentation of Hayward PLLC* (the “Notice”) in support of its *Proposed Form of Judgment*, in accordance with the Court’s directive in its *Report and Recommendation to District Court: Court Should Grant Plaintiff’s Motion for Partial Summary Judgment Against All Five Note Maker Defendants (With Respect to All Sixteen Promissory Notes) in the Above-Referenced Consolidated Note Actions* (the “R&R”)<sup>1</sup> entered on July 19, 2022.

<sup>1</sup> Identical copies of the R&R were filed in Adv. Pro. No. 21-03003 at Docket No. 191; Adv. Pro. No. 21-03004 at Docket No. 163; Adv. Pro. No. 21-03005 at Docket No. 207; Adv. Pro. No. 21-03006 at Docket No. 213; and Adv. Pro. No. 21-03007 at Docket No. 208.

1. Attached as **Exhibit 1** is the *Declaration of Zachery Z. Annable in Support of Highland Capital Management, L.P.'s Proposed Form of Judgment* (the "Annable Declaration") and backup documentation supporting the calculation of attorneys' fees.

Dated: August 5, 2022

**PACHULSKI STANG ZIEHL & JONES LLP**

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-and-

**HAYWARD PLLC**

/s/ Zachery Z. Annable

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## **EXHIBIT 1**

Case No. 3:21-cv-00881-X

HIGHLAND CAPITAL MANAGEMENT, L.P.,

Plaintiff,

VS.

HIGHLAND CAPITAL MANAGEMENT FUND  
ADVISORS, L.P.,

Defendant.

HIGHLAND CAPITAL MANAGEMENT, L.P.,

Plaintiff,

VS.

NEXPOINT ADVISORS, L.P., JAMES  
DONDERO, NANCY DONDERO, AND  
THE DUGABOY INVESTMENT TRUST,

Defendants.

HIGHLAND CAPITAL MANAGEMENT, L.P.,

Plaintiff,

VS.

HIGHLAND CAPITAL MANAGEMENT  
SERVICES, INC., JAMES DONDERO,  
NANCY DONDERO, AND THE DUGABOY  
INVESTMENT TRUST,

Defendants.

HIGHLAND CAPITAL MANAGEMENT, L.P.,

Plaintiff,

VS.

HCRE PARTNERS, LLC (n/k/a NexPoint Real Estate Partners, LLC), JAMES DONDERO, NANCY DONDERO, AND THE DUGABOY INVESTMENT TRUST,

Defendants.

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Adv. Proc. No. 21-03007-sgj

Case No. 3:21-cv-00881-X

**DECLARATION OF ZACHERY Z. ANNABLE IN SUPPORT OF  
HIGHLAND CAPITAL MANAGEMENT L.P.'S PROPOSED FORM OF JUDGMENT**

I, Zachery Z. Annable, pursuant to 28 U.S.C. § 1746, under penalty of perjury, declare as follows:

1. I am a partner in the law firm of Hayward PLLC (the “Firm”), local counsel to Highland Capital Management, L.P. (“Highland” or “Plaintiff”), the reorganized debtor in the above-captioned chapter 11 case (the “Bankruptcy Case”) and the plaintiff in the above-referenced adversary proceedings (each, a “Note Litigation,” and collectively, the “Notes Litigation”). I submit this Declaration in support of *Highland Capital Management, L.P.’s Proposed Forms of Judgment* (the “Proposed Judgments”).

2. I have overseen my Firm's representation of Plaintiff in all aspects of the Notes Litigation. This Declaration is based on my personal knowledge and review of the documents described below.

3. On July 19, 2022, the Bankruptcy Court rendered a *Report and Recommendation to District Court: Court Should Grant Plaintiff's Motion for Partial Summary Judgment Against All Five Note Maker Defendants (With Respect to All Sixteen Promissory Notes) in the Above-*



*Referenced Consolidated Note Actions* (the “R&R”).<sup>1</sup> In the R&R, the Court directed Highland to “submit a form of Judgment applicable to each Note Maker Defendant that calculates proper amounts due pursuant to th[e] Report and Recommendation, including interest accrued to date (and continuing per diem), as well as attorneys’ fees incurred.” R&R at 44-45.

4. As set forth below, and in accordance with the Court’s direction in the R&R, I and others working at my direction have reviewed my Firm’s time entries as they relate to the Notes Litigation and calculated the amount of attorneys’ fees incurred in connection therewith.

5. In the ordinary course of business, timekeepers (including attorneys and legal assistants) at my Firm record billable time in increments of one-tenth of an hour.

6. Attached as **Exhibit A** are the Firm’s time entries for the period January 1, 2021, through July 31, 2022, that reflect the Firm’s time billed to the Notes Litigation. Three Firm professionals billed time to the Notes Litigation: (i) Melissa S. Hayward, attorney, at the rate of \$450/hour; (ii) Zachery Z. Annable, attorney, at the rate of \$400/hour; and (iii) Melanie Holmes, paralegal, at the rates of \$175/hour to \$195/hour.

7. I have reviewed the attached time entries and, based on that review, believe the attached time entries capture and reflect fees properly charged to the Notes Litigation.

8. For the period January 1, 2021, through July 31, 2022, the fees billed by the Firm’s timekeepers with respect to the Notes Litigation total \$76,059.50 (the “Fees”). The hours billed by the Firm’s timekeepers with respect to the Notes Litigation total 190.3 hours. The average hourly rate for work done by the Firm’s professionals with respect to the Notes Litigation was \$399.68.

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<sup>1</sup> Identical copies of the R&R were filed in Adv. Pro. No. 21-03003 at Docket No. 191; Adv. Pro. No. 21-03004 at Docket No. 163; Adv. Pro. No. 21-03005 at Docket No. 207; Adv. Pro. No. 21-03006 at Docket No. 213; and Adv. Pro. No. 21-03007 at Docket No. 208.

9. As the Court is aware, there was substantial overlap in the legal and factual issues in the five adversary proceedings. Consequently, there was no reasonable way to allocate the Fees separately between each Note Litigation, and I believe the fairest method of allocating the Fees is to charge each group of defendants in the five adversary proceedings for one-fifth the total, or \$15,211.90 per adversary proceeding.

10. I declare under penalty of perjury that the forgoing is true and correct.

Dated: August 5, 2022

/s/ Zachery Z. Annable  
Zachery Z. Annable

**EXHIBIT A**

Date	TK	Description	Hrs	Rate	Amount
01/12/2021	MSH	Exchange email with H. Winograd and Z. Annable regarding Aps regarding demand notes and writs of attachments (.10).	0.1	\$450.00	\$ 45.00
01/12/2021	ZZA	Review correspondence from H. Winograd regarding issues related to collection of demand notes (.1).	0.1	\$400.00	\$ 40.00
01/22/2021	MSH	Review complaints regarding Dondero et al notes and exchange email regarding coordination of filing of same and exhibits (.20).	0.2	\$450.00	\$ 90.00
01/22/2021	ZZA	Review correspondence from J. Morris regarding numerous complaints to be filed on demand notes (.1); review and revise five draft complaints for collection of demand notes (1.0); review correspondence from H. Winograd regarding issues related to complaints to collect on notes (.1); prepare cover sheets for suits on notes (.3); exchange multiple correspondence with J. Morris and H. Winograd regarding issues related to finalization of complaints to collect on notes (.2); exchange correspondence with H. Winograd regarding exhibits for complaints on notes (.1); review correspondence from H. Winograd regarding issues related to complaints to collect on notes (.1); correspond with H. Winograd regarding issues related to finalization of complaints for collection of notes (.1); review correspondence from J. Morris regarding complaints to be filed regarding notes (.1); finalize and file five complaints for collection of notes (.7).	2.8	\$400.00	\$ 1,120.00
01/28/2021	ZZA	Correspond with counsel for J. Dondero regarding acceptance of service of summons in AP 21-3003 and 21-3006 (.1); correspond with counsel for HCMFA and NPA regarding acceptance of service of summons in AP 21-3004 and 21-3005 (.1); review multiple correspondence from M. Lynn, counsel for Dondero, advising of acceptance of service of summons (.1); review correspondence from G. Demo regarding additional service issues related to note adversaries (.1); correspond with T. Ellison and M. Edmond regarding need for issuance of new summons to correct name of defendant in 21-3007 (.2); follow-up correspondence with M. Lynn regarding his notice that his firm does not represent HCMSI (.1); review new summons issued in AP 21-3007 (.1); exchange correspondence with M. Edmond regarding new summons issued in AP 21-3007 (.1); correspond with L. Drawhorn, counsel for HCMSI, requesting acceptance of summons in 21-3006 (.1); correspond with L. Drawhorn, counsel for HCRE, requesting acceptance of summons in 21-3007 (.1); correspond with M. Lynn serving him with summons and complaint in AP 21-3003 (.1).	1.2	\$400.00	\$ 480.00
01/29/2021	ZZA	Follow-up correspondence with counsel for HCMFA and NPA regarding acceptance of service of summons and complaint in AP 21-3004 and 21-3005 (.1); follow-up correspondence with counsel for HCMSI and HCRE regarding acceptance of service of summons and complaint in AP 21-3006 and 21-3007 (.1); review correspondence from D. Rukavina, counsel for HCMFA and NPA, agreeing to accept service of summons and complaint in APs 21-3004 and 21-3005 (.1); serve D. Rukavina with complaint and summons in AP 21-3004 and 21-3005 (.1).	0.4	\$400.00	\$ 160.00
01/31/2021	ZZA	Review multiple correspondence from L. Drawhorn, counsel for HCMSI and HCRE, requesting summons and complaint in AP 21-3006 and 21-3007 (.1).	0.1	\$400.00	\$ 40.00

02/01/2021	ZZA	Correspond with L. Drawhorn, counsel for HCMSI and HCRE, providing complaint and summons in APs 21-3006 and 21-3007 and requesting acceptance of service (.3); review multiple correspondence from L. Drawhorn regarding issues related to acceptance of service on behalf of HCMSI and HCRE (.1); correspond with J. Morris regarding issues related to service of summons and complaint on HCMSI and HCRE (.1); follow-up correspondence with J. Morris regarding issues related to service of summons and complaint on HCMSI and HCRE (.1); review correspondence from J. Morris regarding issues related to service of summons and complaint on HCMSI and HCRE (.1); multiple correspondence with L. Drawhorn regarding issues related to service of summons and complaint on her clients HCMSI and HCRE (.2).	0.9	\$400.00	\$ 360.00
02/02/2021	ZZA	Multiple follow-up correspondence with L. Drawhorn, counsel for HCMSI and HCRE, regarding her acceptance of service of summons and complaint in APs 21-3006 and 21-3007 (.2).	0.2	\$400.00	\$ 80.00
02/09/2021	ZZA	Prepare and file notices of service of summons and complaints in Aps 21-3003, 21-3004, 21-3005, 21-3006, and 21-3007 (.7); correspond with J. Morris providing file-stamped copies of service summons executed in multiple APs (.1).	0.8	\$400.00	\$ 320.00
02/11/2021	ZZA	Exchange correspondence with C. Taylor, counsel for J. Dondero, regarding waiver of service of summons in AP 21-3003 (.2); review follow-up correspondence from C. Taylor regarding issues related to deadlines in AP 21-3003 (.1); review multiple follow-up correspondence from C. Taylor and J. Morris regarding deadline for J. Dondero to answer complaint in AP 21-3003 (.1).	0.4	\$400.00	\$ 160.00
02/12/2021	ZZA	Review draft stipulation regarding answer date in AP 21-3003 received from C. Taylor (.1).	0.1	\$400.00	\$ 40.00
03/01/2021	ZZA	Review Advisors' answers to complaints filed in APs 21-3004 and 21-3005 (.3).	0.3	\$400.00	\$ 120.00
03/02/2021	ZZA	Multiple correspondence with J. Morris regarding Advisors' answers filed in response to debtor's complaints in APs 21-3004 and 21-3005 (.2); review multiple correspondence from J. Morris regarding ECF notice issues in APs 21-3004 and 21-3005 (.1); exchange correspondence with H. Winograd regarding ECF notice issues in APs 21-3004 and 21-3005 (.1); review correspondence from J. Morris regarding analysis of Advisors' answers to complaints (.1).	0.5	\$400.00	\$ 200.00
03/03/2021	ZZA	Review HCM Services' answer to debtor's complaint in AP 21-3006 (.2); review HCRE's answer to debtor's complaint in AP 21-3007 (.1); correspond with J. Morris providing him with copies of HCM Services' and HCRE's answers and seeking confirmation of his receipt of ECF notices in APs (.1).	0.4	\$400.00	\$ 160.00
03/04/2021	ZZA	Review correspondence and draft scheduling orders regarding Aps 21-3004 and 21-3005 received from J. Morris (.2); review correspondence from L. Hogewood regarding proposed scheduling order in APs 21-3004 and 21-3005 (.1).	0.3	\$400.00	\$ 120.00
03/05/2021	ZZA	Review correspondence from L. Drawhorn, counsel for HCMSI and HCRE, regarding proposed scheduling orders in APs 21-3006 and 21-3007 (.1); review proposed scheduling orders in APs 21-3006 and 21-3007 received from J. Morris (.2).	0.3	\$400.00	\$ 120.00

03/08/2021	ZZA	Finalize and file pretrial stipulations and proposed orders thereon in AP 21-3004 and 21-3005 (.2); correspond with T. Ellison, courtroom deputy, regarding filing of stipulations and submission of proposed scheduling orders for court review (.1); review correspondence from T. Ellison advising of revisions needed to scheduling orders to comply with court's schedule (.1); review multiple correspondence from J. Morris and H. Winograd regarding revisions to be made to scheduling orders (.1); research court's upcoming trial docket call dates and exchange multiple correspondence with H. Winograd and J. Morris regarding same (.2); correspondence from L. Drawhorn, counsel for HCMSI and HCRE, regarding requested revisions to AP scheduling orders (.1); review draft revised scheduling order for AP 21-3004 received from H. Winograd (.1).	0.9	\$400.00	\$ 360.00
03/09/2021	ZZA	Review correspondence from J. Morris regarding revisions to be made to scheduling order in AP 21-3004 (.1); review correspondence from L. Drawhorn, counsel for HCMSI and HCRE, regarding proposed revisions to scheduling orders in APs 21-3006 and 21-3007 (.1); view correspondence from H. Winograd regarding revisions to scheduling order in AP 21-3004 (.1); review correspondence from H. Winograd regarding revisions to scheduling orders in APs 21-3006 and 21-3007 (.1); review multiple follow-up correspondence from J. Morris regarding revision of dates in proposed scheduling orders with HCMSI and HCRE (.1); review correspondence from H. Winograd regarding issues related to HCMSI's and HCRE's requested revisions to scheduling orders (.1); review follow-up correspondence from J. Morris regarding revision of deadlines in scheduling orders for APs 21-3006 and 21-3007 (.1); review correspondence from J. Morris regarding proposed trial docket call dates in pending note adversaries (.1); review correspondence from D. Rukavina approving proposed scheduling orders in APs 21-3004 and 21-3005 (.1); correspond with J. Morris and H. Winograd regarding issues related to scheduling orders to be presented in APs 21-3004 and 21-3005 (.1); review multiple correspondence from H. Winograd regarding finalization of scheduling orders in APs 21-3006 and 21-3007 (.1); finalize and file stipulations regarding scheduling orders in APs 21-3004 and 21-3005 (.2); prepare draft orders approving stipulations in APs 21-3006 and 21-3007 and correspond with J. Morris and H. Winograd regarding same (.2); review and revise stipulations regarding scheduling orders in APs 21-3006 and 21-3007 and prepare draft orders approving stipulations (.4); correspond with H. Winograd regarding proposed revisions to stipulations in APs 21-3006 and 21-3007 (.1); exchange follow-up correspondence with H. Winograd regarding	2.5	\$400.00	\$ 1,000.00
03/10/2021	ZZA	Review correspondence from T. Ellison regarding revisions needed in orders approving stipulations in APs 21-3004 and 21-3005 (.1); revise proposed orders approving stipulations in APs 21-3004 and 21-3005 and correspond with D. Rukavina and J. Morris regarding same (.2); exchange correspondence with D. Rukavina regarding approval of orders approving stipulations in APs 21-3004 and 21-3005 (.1); finalize and upload revised proposed orders approving stipulations in APs 21-3004 and 21-3005 and correspond with T. Ellison regarding same (.2).	0.6	\$400.00	\$ 240.00

03/11/2021	ZZA	Exchange correspondence with L. Drawhorn, counsel for HCMSI and HCRE, regarding approving of stipulations and orders in APs 21-3006 and 21-3007 (.1); correspond with H. Winograd regarding issues related to proposed scheduling orders in APs 21-3006 and 21-3007 (.1); review follow-up correspondence from H. Winograd regarding finalization and filing of stipulations regarding scheduling in APs 21-3006 and 21-3007 (.1); finalize and file stipulations regarding pretrial scheduling in APs 21-3006 and 21-3007 (.2); upload proposed orders approving stipulations in APs 21-3006 and 21-3007 and correspond with T. Ellison regarding same (.2).	0.7	\$400.00	\$ 280.00
03/17/2021	ZZA	Review court's orders approving stipulations and scheduling in APs 21-3004, 21-3005, 21-3006, and 21-3007 (.2); review Dondero's answer in AP 21-3003 (.1).	0.3	\$400.00	\$ 120.00
03/24/2021	ZZA	Exchange correspondence with H. Winograd regarding Dondero's answer in AP 21-3003 (.1).	0.1	\$400.00	\$ 40.00
03/25/2021	ZZA	Exchange correspondence with J. Morris regarding additional discovery to be taken in adversary proceedings (.2); exchange correspondence with J. Morris regarding revisions to deposition notice of J. Dondero in AP 21-3003 (.2); finalize and file notice of deposition of J. Dondero in AP 21-3003 (.1); correspond with J. Morris regarding Dondero deposition notice in AP 21-3003 (.1).	0.6	\$400.00	\$ 240.00
03/26/2021	ZZA	Review Dondero's motion to amend scheduling order in AP 21-3003 (.1); review Dondero's motion for expedited hearing on motion to amend scheduling order (.1); correspond with J. Morris regarding Dondero's request to amend scheduling order in AP 21-3003 (.1); exchange multiple correspondence with J. Morris regarding Dondero's request for emergency hearing on motion to amend scheduling order and actions to be taken regarding same (.3); correspond with T. Ellison regarding Dondero's motion to amend scheduling order, debtor's opposition to same, and debtor's lack of opposition to Dondero's motion for emergency hearing on motion to amend scheduling order (.2); exchange follow-up correspondence with T. Ellison regarding debtor's deadline to file response to Dondero's motion to amend scheduling order (.1); calendar deadline for debtor to respond to Dondero's motion to amend scheduling order and correspond with PSZJ team regarding same (.1).	1.0	\$400.00	\$ 400.00

03/30/2021	ZZA	Review correspondence from J. Morris regarding exhibits for debtor's objection to Dondero's motion to amend scheduling order in AP 21-3003 (.1); review multiple correspondence from L. Canty regarding exhibit and evidence issues related to debtor's objection to amendment of scheduling order (.2); review follow-up correspondence from J. Morris regarding issues related to Dondero's motion to amend scheduling order and discussions regarding same (.1); review and revise debtor's objection to Dondero's motion to amend scheduling order and correspond with J. Morris regarding revisions (.7); review and revise Morris declaration in support of debtor's objection and correspond with J. Morris regarding revisions (.2); review multiple follow-up correspondence from J. Morris regarding revisions to objection and declaration and filing of same (.1); exchange correspondence with L. Canty regarding exhibits to debtor's objection (.1); finalize and file debtor's objection to Dondero's motion to amend scheduling order (.2); finalize and file Morris declaration and exhibits in support of debtor objection (.2); correspond with T. Ellison advising of filing of debtor's objection to Dondero motion to amend scheduling order (.1); exchange follow-up correspondence with J. Morris regarding debtor's objection to Dondero's motion to amend scheduling order (.1); review correspondence from T. Ellison regarding debtor's redacted exhibits filed with Morris declaration (.1); review follow-up correspondence from T. Ellison regarding court's ruling on Dondero's motion to amend scheduling order (.1).	2.3	\$400.00	\$ 920.00
04/02/2021	ZZA	Calendar deadlines for discovery responses in AP 21-3005 and correspond with PSZJ attorneys regarding same (.1).	0.1	\$400.00	\$ 40.00
04/05/2021	ZZA	Review and revise proposed scheduling order in AP 21-3003 and correspond with H. Winograd regarding revisions (.2); exchange multiple follow-up correspondence with H. Winograd regarding revisions to proposed scheduling order in AP 21-3003 (.2).	0.4	\$400.00	\$ 160.00
04/06/2021	ZZA	Review committee's notice of appearances in note adversaries and correspond with PSZJ team regarding same (.3); review J. Dondero's amended answer in AP 21-3003 and correspond with PSZJ attorneys regarding same (.2).	0.5	\$400.00	\$ 200.00
04/07/2021	ZZA	Review proposed amended scheduling order in AP 21-3003 received from B. Assink, counsel for J. Dondero (.1).	0.1	\$400.00	\$ 40.00
04/09/2021	ZZA	Review court's amended scheduling order in AP 21-3003 (.1).	0.1	\$400.00	\$ 40.00
04/13/2021	ZZA	Review Advisors' motions to withdraw the reference filed in APs 21-3004 and 21-3005 (.6); review notices of hearing on motions to withdraw reference in APs 21-3004 and 21-3005 (.1); exchange correspondence with J. Pomerantz regarding motions to withdraw the reference filed in APs 21-3004 and 21-3005 (.1).	0.8	\$400.00	\$ 320.00



04/15/2021	ZZA	Exchange correspondence with J. Morris regarding discovery issues in AP 21-3003 (.1); review and revise Rule 26 disclosures in AP 21-3003 and correspond with J. Morris regarding same (.2); review Dondero's motion to withdraw the reference in AP 21-3003 (.4); review Dondero's motion to stay proceedings filed in AP 21-3003 (.2).	0.9	\$400.00	\$ 360.00
04/16/2021	ZZA	Review Dondero's motion for expedited hearing on motion to withdraw reference in AP 21-3003 (.2).	0.2	\$400.00	\$ 80.00
04/18/2021	ZZA	Review notice of transmittal of motion to withdraw reference filed in AP 21-3005 to case no. 3:21-cv-880 (.1); correspond with PSZJ attorneys regarding transfer of motion to withdraw reference and need for filing of phv applications in district court case 3:21-cv-880 (.2); review notice of transmittal of motion to withdraw reference filed in AP 21-3004 to case no. 3:21-cv-881 (.1); correspond with PSZJ attorneys regarding transfer of motion to withdraw reference and need for filing of phv applications in case 3:21-cv-881 (.2); review multiple follow-up correspondence from G. Demo and L. Canty regarding preparation of phv applications for PSZJ attorneys (.1); review draft objection to Dondero's motion to expedite hearing on stay motion (.2).	0.9	\$400.00	\$ 360.00
04/19/2021	MSH	Exchange email regarding objection to Dondero motion to stay AP and opposition to expedited hearing and review emails with court regarding same and setting (.30); review email from court denying motion for expedited hearing on Dondero motion to stay (.10).	0.4	\$450.00	\$ 180.00
04/19/2021	ZZA	Review notice of appearance of D. Deitsch-Perez as counsel for J. Dondero in AP 21-3003 (.1).	0.1	\$400.00	\$ 40.00
04/19/2021	ZZA	Review correspondence from J. Morris regarding issues related to debtor's forthcoming response to Dondero's motion for expedited consideration of motion to stay (.1); exchange correspondence with H. Winograd regarding issues related to forthcoming responses to motions for withdrawal of reference (.1); correspond with T. Ellison regarding debtor's intent to file response to Dondero motion for expedited hearing on stay motion (.1); review multiple correspondence from J. Morris regarding debtor's forthcoming response to Dondero's motion for expedited hearing (.1); review correspondence from T. Ellison regarding scheduling of status conference on Dondero's motion to withdraw reference (.1);	0.5	\$400.00	\$ 200.00
04/20/2021	ZZA	Finalize and file notice of deposition of HCMFA in AP 21-3004 (.2).	0.2	\$400.00	\$ 80.00

04/20/2021	ZZA	Review multiple correspondence from J. Morris regarding discovery to be issued in notes litigation (.2); correspond with D. Rukavina, counsel for Advisors, serving him with discovery in notes litigation (.1); calendar deadline for HCMFA to respond to discovery requests and correspond with PSZJ attorneys regarding same (.1); correspond with J. Morris following up on discovery in notes litigation (.1);	0.5	\$400.00	\$ 200.00
04/22/2021	ZZA	Finalize and file notice of deposition of J. Dondero in AP 21-3003 (.2); review notice of status conference on J. Dondero's motion to withdraw reference in AP 21-3003 (.1); calendar status conference in AP 21-3003 and correspond with PSZJ attorneys regarding same (.1); review and respond to inquiry from M. DesJardien regarding pending adversary proceedings in Highland case (.2); correspond with M. DesJardien regarding notice of deposition of J. Dondero in AP 21-3003 (.1).	0.7	\$400.00	\$ 280.00
04/22/2021	ZZA	Review correspondence from J. Seery regarding issues related to HCMS and HCRE requests to amend answers in notes litigation (.1); review multiple follow-up correspondence from J. Morris and J. Seery regarding issues related to HCMS and HCRE requests to amend answers (.2); review correspondence from L. Drawhorn, counsel for HCMS and HCRE, regarding additional defenses defendants seek to assert in notes litigation (.1).	0.4	\$400.00	\$ 160.00
04/25/2021	ZZA	Review correspondence from J. Morris regarding issues related to HCMS and HCRE requests to amend answers in notes litigation (.1).	0.1	\$400.00	\$ 40.00
05/04/2021	ZZA	finalize and file debtor's response to motion to withdraw the reference in AP 21-3005 (.3); correspond with V. Trang providing instructions for service of debtor's response in 21-3005 (.1); review follow-up correspondence from J. Kim regarding debtor's response to HCMFA's motion to withdraw the reference (.1); finalize and file debtor's response to HCMFA's motion to withdraw reference in AP 21-3004 (.2); correspond with J. Kim regarding responses to reference withdrawal motions filed in APs 21-3004 and 21-3005 (.1).	0.8	\$400.00	\$ 320.00
05/04/2021	ZZA	Correspond with V. Trang providing instructions for service of objection to Dondero's stay motion (.1); correspond with V. Trang providing instructions for service of response in AP 21-3004 (.1).	0.2	\$400.00	\$ 80.00
05/06/2021	MSH	Exchange email regarding objection to Dondero motion to withdraw reference in AP (.10).	0.1	\$450.00	\$ 45.00
05/06/2021	ZZA	Finalize and file debtor's response to Dondero's motion to withdraw the reference in AP 21-3003 (.2).	0.2	\$400.00	\$ 80.00
05/07/2021	MSH	Review addendum to Dondero motion to withdraw reference in Note AP (.10).	0.1	\$450.00	\$ 45.00
05/07/2021	ZZA	Review correspondence from J. Kim regarding addendum to opposition to Dondero's motion to withdraw reference in AP 21-3003 (.1).	0.1	\$400.00	\$ 40.00

05/10/2021	ZZA	Review HCMSI's motion for leave to amend Highland Capital Management, L.P. answer in AP 21-3006 (.2); review HCRE's motion for leave to amend answer in AP 21-3007 (.1); correspond with J. Pomerantz, J. Morris, and G. Demo regarding HCMSI's and HCRE's motions for leave to amend answers (.1); review notices of hearing on motions for leave to amend answers in APs 21-3006 and 21-3007 (.1); correspond with PSZJ team regarding notices of hearing filed by HCMSI and HCRE (.1); exchange correspondence with J. Morris regarding deadlines to respond to motions for leave to amend answers (.1); calendar deadlines related to motions for leave to amend answers in APs 21-3006 and 21-3007 and correspond with PSZJ team regarding same (.2).	0.9	\$400.00	\$ 360.00
05/13/2021	ZZA	Review notice of deposition of debtor representative filed by J. Dondero in AP 21-3003 (.1).	0.1	\$400.00	\$ 40.00
05/18/2021	ZZA	Finalize and file debtor's response to motion to compel Seery testimony in AP 21-3003 (.1); review defendants' replies in support of motions to withdraw reference filed in APs 21-3004 and 21-3005 (.2); correspond with PSZJ team regarding defendants' replies in support of motions to withdraw reference filed in APs 21-3004 and 21-3005 (.1);	0.3	\$400.00	\$ 120.00
05/19/2021	ZZA	Review notice of hearing on Dondero motion to compel in AP 21-3003 (.1); correspond with PSZJ team regarding 5/20 hearing setting on motion to compel in AP 21-3003 (.1); exchange multiple follow-up correspondence with L. Canty and J. Pomerantz regarding 5/20 hearing setting on motion to compel in AP 21-3003 (.2); calendar 5/20 hearing on Dondero's motion to compel in AP 21-3003 and correspond with PSZJ team regarding same (.1).	0.5	\$400.00	\$ 200.00
05/21/2021	HOL	Email correspondence with Z. Annable regarding request for 5/20 transcript in AP 21-3003 (0.2); prepare request for transcript of 5/20 hearings, email correspondence with court regarding same (0.2); email correspondence with court reporter regarding 5/20 hearing transcript (0.2)	0.6	\$175.00	\$ 105.00
05/21/2021	ZZA	Finalize and file witness and exhibit lists and exhibits relating to motions for stay pending motion to withdraw reference in APs 21-3003, 21-3005, and 21-3005 (.6); review Dondero's reply in support of motion to withdraw reference in AP 21-3003 (.3).	0.9	\$400.00	\$ 360.00
05/22/2021	ZZA	Review HCMFA's motion for leave to file amended answer in AP 21-3004 (.3).	0.3	\$400.00	\$ 120.00
05/23/2021	ZZA	Review HCMFA's notice of hearing on motion for leave to amend answer (.1).	0.1	\$400.00	\$ 40.00
05/25/2021	HOL	Prepare transcript requests for 5/25 hearings in Advs. 21-03003, 21-03004, and 21-03005, email correspondence regarding same (0.3);	0.3	\$175.00	\$ 52.50
05/28/2021	MSH	Receive and review Dondero motion to compel discovery in AP (.10).	0.1	\$450.00	\$ 45.00
05/28/2021	ZZA	Calendar hearing on HCMFA's motion for leave to file amended answer and correspond with PSZJ team regarding same (.1); review Dondero's motion to compel filed in AP 21-3003 (.2).	0.3	\$400.00	\$ 120.00

05/31/2021	ZZA	Review correspondence from H. Winograd regarding forthcoming objections to motions to amend in APs 21-3006 and 21-3007 (.1).	0.1	\$400.00	\$ 40.00
06/01/2021	MSH	Exchange email regarding finalization of objection to HCMS and HCRE motions to amend answer and filing issues (.40).	0.4	\$450.00	\$ 180.00
06/01/2021	ZZA	Finalize and upload to court order granting in part Dondero's motion to stay proceedings pending withdrawal of reference in AP 21-3003 (.2); correspond with T. Ellison advising of submission of proposed order in AP 21-3003 (.1); work on finalizing, filing, and service of debtor's objections and related documents to HCRE and HCMS motions for leave to file amended complaints in APs 21-3006 and 21-3007 (1.2).	1.5	\$400.00	\$ 600.00
06/02/2021	ZZA	Exchange correspondence with J. Morris regarding deadline to motion to compel filed in AP 21-3003 (.1).	0.1	\$400.00	\$ 40.00
06/03/2021	MSH	Review various notices of depositions issued in Dondero AP (.20).	0.2	\$450.00	\$ 90.00
06/03/2021	ZZA	Finalize and file notices of deposition of A. Johnson, B. McGovern, and N. Dondero in AP 21-3003 (.2); exchange correspondence with J. Morris regarding parties to be served with deposition notices in AP 21-3003 (.1); multiple correspondence with PSZJ team providing copies of motions to withdraw reference, briefs in support, and appendices filed in APs 21-3006 and 21-3007 (.2); review notices of appearance of counsel filed in APs 21-3006 and 21-3007 (.1); correspond with PSZJ team providing them with copies of just-filed motions to stay pending resolution of withdrawal of reference and motions for expedited hearing thereon filed in APs 21-3006 and 21-3007 (.2); review HCMS and HCRE motions to withdraw reference, briefs in support, motions for stay pending resolution of reference withdrawal, and motions for expedited hearing in APs 21-3006 and 21-3007 (.7).	1.5	\$400.00	\$ 600.00
06/04/2021	MSH	Review order staying AP pending motion to withdraw reference (.10).	0.1	\$450.00	\$ 45.00
06/04/2021	ZZA	Review court's order staying AP 21-3003 until 7/28/21 (.1).	0.1	\$400.00	\$ 40.00
06/07/2021	ZZA	Review multiple correspondence from G. Demo and H. Winograd regarding issues related to debtor's response to HCMFA's motion for leave to amend answer in AP (.1); correspond with H. Winograd regarding issues related to debtor's forthcoming response to HCMFA's motion for leave to amend answer (.1); finalize and file notice of deposition of HCMSI in AP 21-3006 (.1); review notices of status conference on motions to withdraw reference in APs 21-3006 and 21-3007 (.1).	0.4	\$400.00	\$ 160.00

06/09/2021	ZZA	Review and analyze HCMSI's and HCRE's replies in support of motions for leave to file amended answers in APs 21-3006 and 21-3007 (.5); correspond with J. Pomerantz, J. Morris, and G. Demo regarding replies filed in APs 21-3006 and 21-3007 (.1); review and analyze NexPoint's motion for leave to amend answer in AP 21-3005 and correspond with J. Pomerantz, J. Morris, and G. Demo regarding same (.4).	1.0	\$400.00	\$ 400.00
06/11/2021	ZZA	Review amended answers filed by defendants in APs 21-3006 and 21-3007 (.2);	0.2	\$400.00	\$ 80.00
06/12/2021	ZZA	Review correspondence from G. Demo regarding analysis of amended answers filed by defendants in APs 21-3006 and 21-3007 (.1).	0.1	\$400.00	\$ 40.00
06/14/2021	ZZA	Review notice of transmission of motion to withdraw the reference to district court filed in AP 21-3007 (.1); review notice of transmission of motion to withdraw the reference to district court in AP 21-3006 (.1); correspond with J. Pomerantz, J. Morris, and G. Demo regarding district court case proceedings related to motions withdraw reference in APs 21-3006 and 21-3007 (.1).	0.3	\$400.00	\$ 120.00
06/16/2021	ZZA	Review Judge Fish's request for recusal in 3:21-cv-1379 (.1);	0.1	\$400.00	\$ 40.00
06/18/2021	ZZA	Review re-filed notice of subpoena on PwC filed in AP 21-3006 and correspond with PSZJ team regarding same (.1); review court's order granting HCMSI's motion for leave to amend answer in AP 21-3006 (.1); review court's order granting HCRE's motion for leave to amend answer in AP 21-3007 (.1).	0.3	\$400.00	\$ 120.00
06/21/2021	ZZA	Review clerk's correspondence requesting order from NexPoint in AP 21-3005 (.1);	0.1	\$400.00	\$ 40.00
06/30/2021	ZZA	Review motion for protective order filed by HCMFA and NexPoint Advisors in APs 21-3004 and 21-3005 (.4);	0.4	\$400.00	\$ 160.00
07/02/2021	ZZA	Review notices of hearing on motions for protective orders filed in APs 21-3004 and 21-3005 (.1); calendar hearings on motions for protective orders in APs 21-3004 and 21-3005 and correspond with PSZJ team regarding same (.1); review court's order granting leave for HCMFA to file amended answer in AP 21-3004 (.1).	0.3	\$400.00	\$ 120.00
07/06/2021	ZZA	Review HCMFA's amended answer filed in AP 21-3004 (.2); review amended notices of hearing on motions for protective order in APs 21-3004 and 21-3005 (.1); review HCRE's responses to debtor's discovery requests in AP 21-3007 (.3); correspond with G. Demo and H. Winograd regarding HCRE's discovery responses in AP 21-3007 (.1).	0.7	\$400.00	\$ 280.00

07/07/2021	ZZA	Review and analyze court's report and recommendation regarding withdrawal of the reference in AP 21-3003 (.4); review notices of transmission of report and recommendation regarding withdrawal of the reference (.1).	0.5	\$400.00	\$ 200.00
07/08/2021	ZZA	Review court's report and recommendation on withdrawal of reference in AP 21-3004 (.2).	0.2	\$400.00	\$ 80.00
07/09/2021	ZZA	Review notice of transmission of report on withdrawal of reference from AP 21-3004 to district court and correspond with PSZJ team regarding same and filing of phv applications in proceeding (.2); review notice of transmission of report on withdrawal of reference from AP 21-3005 to district court (.1).	0.3	\$400.00	\$ 120.00
07/14/2021	ZZA	Review court's reports and recommendations with respect to motions to withdraw reference filed in APs 21-3006 and 21-3007 (.2); multiple correspondence with PSZJ team regarding court's reports and recommendations issued in APs 21-3006 and 21-3007 (.2).	0.4	\$400.00	\$ 160.00
07/15/2021	ZZA	Review notice of transmittal of report and recommendation on motion to withdraw reference in AP 21-3006 to district court (.1); review notice of transmittal of report and recommendation on motion to withdraw reference in AP 21-3007 to district court (.1).	0.2	\$400.00	\$ 80.00
07/19/2021	ZZA	Review NPA's CNO regarding motion for leave to amend answer filed in AP 21-3005 (.1).	0.1	\$400.00	\$ 40.00
07/21/2021	ZZA	Review and analyze Dondero's limited objection to report and recommendation on withdrawal of reference filed in 3:21-cv-1010 (.4); multiple correspondence with J. Pomerantz, J. Morris, and G. Demo regarding Dondero's objection to report and recommendation and appendix in support (.1); exchange multiple correspondence with J. Pomerantz and J. Morris regarding issues related to Dondero's objection to report and recommendation on withdrawal of reference (.3).	0.8	\$400.00	\$ 320.00
07/22/2021	MSH	Exchange email regarding objection to R&R and legal analysis regarding same (.10).	0.1	\$450.00	\$ 45.00
07/23/2021	ZZA	Review correspondence from J. Morris regarding subpoenas to be issued in notes litigation (.1); review and revise notices of subpoenas to be issued regarding notes litigation and correspond with J. Morris regarding revisions (.4); prepare subpoenas for service in notes litigation (.5); exchange multiple correspondence with J. Morris regarding additional issues related to issuance of subpoenas on notes litigation (.2).	1.2	\$400.00	\$ 480.00
07/24/2021	ZZA	Review multiple correspondence from J. Morris regarding subpoenas to be issued in notes litigation (.1).	0.1	\$400.00	\$ 40.00

07/26/2021	ZZA	Review district court's order on motion to withdraw reference originally filed in AP 21-3006 and correspond with J. Morris, J. Pomerantz, and G. Demo regarding issues related to same (.2).	0.2	\$400.00	\$ 80.00
07/26/2021	ZZA	Finalize and file notices of subpoenas issued to PricewaterhouseCoopers in notes litigation (.7); follow-up correspondence with J. Morris regarding filing of subpoenas in notes litigation (.1).	0.8	\$400.00	\$ 320.00
07/27/2021	ZZA	Review HCMSI's limited objection to report and recommendation regarding withdrawal of reference and motion to reconsider order on withdrawal of reference filed in 3:21-cv-1378 (.4); review HCRE's limited objection to report and recommendation regarding withdrawal of reference filed in 3:21-cv-1379 (.2); multiple correspondence with PSZJ team regarding HCRE and HCMSI objections to reports and recommendations on withdrawal of reference and ECF noticing issues in cases 3:21-cv-1378 and 3:21-cv-1379 (.2);	0.8	\$400.00	\$ 320.00
07/28/2021	ZZA	Review district court's order adopting report and recommendation on withdrawal of reference in 3:21-cv-880 (.1); correspond with J. Pomerantz, J. Morris, and G. Demo regarding substance of district court's order adopting report and recommendation of bankruptcy court on withdrawal of reference (.1);	0.2	\$400.00	\$ 80.00
07/29/2021	ZZA	Review clerk's correspondence requesting order from HCRE regarding motion to stay in AP 21-3007 (.1); review clerk's correspondence requesting order from HCMSI regarding motion to stay in AP 21-3006 (.1); review court's order granting NPA's motion for leave to file amended answer in AP 21-3005 (.1).	0.3	\$400.00	\$ 120.00
07/30/2021	ZZA	Review correspondence from H. Winograd regarding deadlines and issues related to pending notes litigation (.1).	0.1	\$400.00	\$ 40.00
08/02/2021	ZZA	Correspond with H. Winograd regarding deadlines and issues related to pending notes litigation (.1); exchange further correspondence with H. Winograd regarding deadlines related to notes litigation (.1).	0.2	\$400.00	\$ 80.00
08/04/2021	ZZA	review, finalize, and file debtor's reply to Dondero's limited objection to report and recommendation regarding withdrawal of reference in AP 21-3003 (.4); review motions to withdraw as counsel filed by J. Rudd and L. Drawhorn in APs 21-3006 and 21-3007 (.1).	0.5	\$400.00	\$ 200.00
08/05/2021	ZZA	Review, finalize, and file debtor's reply to HCMFA's limited objection to report and recommendation on withdrawal of reference in AP 21-3004 (.4).	0.4	\$400.00	\$ 160.00
08/06/2021	ZZA	Review court's orders granting motions to withdraw as counsel in APs 21-3006 and 21-3007 (.1)	0.1	\$400.00	\$ 40.00
08/06/2021	ZZA	Exchange correspondence with J. Morris regarding issues related to pending notes litigation and scheduled hearings thereon (.2).	0.2	\$400.00	\$ 80.00

08/06/2021	ZZA	exchange correspondence with ECF help desk for district court regarding revision to docket entry in 3:21-cv-881 (.2); review correspondence from G. Demo regarding finalization and filing of certificates of interested persons in pending district court cases (.1); finalize and file certificates of interested persons in cases 3:21-cv-881 and 3:21-cv-1010 (.3).	0.6	\$400.00	\$ 240.00
08/09/2021	MSH	Review response to motion for protective order in HCMFA AP (.10); review response filed in NexPoint AP (.10); review OCC objections to motion for protective order in HCMFA and NexPoint APs (.10).	0.3	\$450.00	\$ 135.00
08/09/2021	ZZA	Review NPA's amended answer filed in AP 21-3005 (.2); review and revise debtor's opposition to HCMFA's motion for protective order in AP 21-3004 and correspond with J. Morris regarding revisions (.4); prepare debtor's opposition to NPA's request for protective order in AP 21-3005 and declaration of J. Morris in support of opposition and correspond with J. Morris regarding same (.5); finalize and file debtor's opposition to motions for protective orders in APs 21-3004 and 21-3005 and declaration of J. Morris in support of opposition (.4); review committee's objections to motions for protective order in APs 21-3004 and 21-3005 (.2).	1.7	\$400.00	\$ 680.00
08/10/2021	ZZA	Revise, finalize, and file debtor's reply to HCRE's limited objection to report and recommendation on withdrawal of reference in AP 21-3007 (.4).	0.4	\$400.00	\$ 160.00
08/16/2021	ZZA	Review, finalize, and file debtor's opposition to HCMSI's motion to reconsider order adopting report and recommendation on withdrawal of reference in 3:21-cv-1378 (.4); correspond with V. Trang of KCC providing instructions for service of opposition (.1); correspond with J. Kim regarding filing of debtor's opposition and provide him file-stamped copy of same (.1);	0.6	\$400.00	\$ 240.00
08/17/2021	ZZA	Review multiple correspondence from J. Morris regarding forthcoming motions to file amended complaints in notes actions (.2); review multiple correspondence from L. Canty regarding exhibits for motions to file amended complaints (.1); review and revise motions to file amended complaints in notes actions and exchange correspondence with J. Morris regarding same (.6); finalize and file debtor's motions for leave to file amended complaints in notes actions (.5); exchange multiple correspondence with V. Trang of KCC providing instructions for service of motions for leave (.2); review follow-up correspondence from J. Morris regarding motions for leave to file amended complaints (.1).	1.7	\$400.00	\$ 680.00
08/17/2021	ZZA	Review district court's order accepting report and recommendation in 3:21-cv-1379 (.1);	0.1	\$400.00	\$ 40.00



08/18/2021	ZZA	Correspond with T. Ellison advising of debtor's filing of unopposed motions for leave to amend complaints in notes litigation (.1); review correspondence from T. Ellison requesting submission of proposed orders on motions to amend complaints in notes actions (.1); exchange correspondence with L. Canty requesting proposed orders on motion to amend complaints in notes actions (.1); review and revise proposed order on motion to amend complaints in notes actions and correspond with J. Morris regarding same (.2);	0.5	\$400.00	\$ 200.00
08/19/2021	ZZA	Review court orders granting motion to stay entered in 21-3006 and 21-3007 (.1); exchange correspondence with J. Morris regarding proposed revisions to orders granting motions to amend complaints in notes actions (.1); revise all proposed orders granting motions to amend complaints in notes actions and correspond with M. Aigen regarding same (.3); review correspondence from M. Aigen approving revised orders on motions to amend complaint filed in notes actions (.1); finalize and submit proposed orders on motions to amend complaints filed in notes actions and correspond with T. Ellison regarding same (.3).	0.9	\$400.00	\$ 360.00
08/20/2021	ZZA	Review notice of appearance of J. Levinger as counsel to Dondero in AP 21-3003 (.1).	0.1	\$400.00	\$ 40.00
08/23/2021	ZZA	review agreed protective order entered in AP 21-3004 (.1); review orders granting motion for leave to amend complaints and agreed protective orders entered in notes actions (.2); exchange multiple correspondence with V. Trang regarding instructions for service of orders entered in notes actions (.3); correspond with J. Morris regarding filing of amended complaints in notes actions (.1);	0.7	\$400.00	\$ 280.00
08/24/2021	ZZA	Exchange multiple correspondence with H. Winograd regarding scheduling stipulations related to notes actions (.2).	0.2	\$400.00	\$ 80.00
08/25/2021	ZZA	Review and revise proposed orders setting notes actions discovery deadlines and correspond with H. Winograd regarding same (.5);	0.5	\$400.00	\$ 200.00
08/26/2021	ZZA	Review correspondence from J. Morris regarding issues related to forthcoming amended complaints to be filed in notes actions (.1); review and revise amended complaints to be filed in notes actions and correspond with J. Morris regarding issues related to same (.6); review correspondence from H. Winograd regarding exhibits to amended notes complaints (.1).	0.8	\$400.00	\$ 320.00

08/27/2021	ZZA	Review correspondence from J. Morris regarding issues related to amended complaints to be filed in notes actions (.1); review multiple correspondence from H. Winograd and J. Morris regarding stipulations and proposed orders regarding discovery issues in notes actions (.2); review, finalize, and file stipulations regarding discovery issues in notes actions (.5); review, finalize, and file orders approving stipulations in notes actions and correspond with T. Ellison regarding same (.4); multiple correspondence with V. Trang of KCC providing instructions for service of stipulations (.2); prepare amended cover sheet for amended complaint in AP 21-3003 and correspond with PSZJ team regarding same (.3); review correspondence from H. Winograd regarding amended cover sheets in notes actions (.1); finalize and file amended complaints in notes action adversaries (.6); multiple correspondence with V. Trang regarding instructions for service of amended complaints (.2).	2.6	\$400.00	\$ 1,040.00
09/01/2021	MSH	Review motions to compel arbitration and motions to dismiss filed by Dondero et al in APs (.20).	0.2	\$450.00	\$ 90.00
09/01/2021	ZZA	Review NexPoint's answer to complaint in AP 21-3005 (.2); review motion to compel arbitration, motion to dismiss HCM's 5th, 6th, and 7th claims, and Dondero's answer to complaint filed in AP 21-3003 (1.5); briefly review motions to compel arbitration, motions to dismiss HCM's 5th, 6th, and 7th claims, and answers filed by defendants in APs 21-3005, 21-3006, and 21-3007 (.6).	2.3	\$400.00	\$ 920.00
09/02/2021	ZZA	Review refiled motions to compel arbitration in APs 21-3003, 21-3005, 21-3006, and 21-3007 (.2).	0.2	\$400.00	\$ 80.00
09/07/2021	ZZA	Review court's order approving stipulation regarding discovery in AP 21-3003 (.1); review court's order approving stipulation in AP 21-3004 (.1); review court's additional orders approving stipulation regarding discovery in Aps 21-3005, 21-3006, and 21-3007 (.2).	0.4	\$400.00	\$ 160.00
09/09/2021	ZZA	Exchange correspondence with H. Winograd regarding deadlines to respond to motions to dismiss and motions to compel arbitration filed in notes actions (.2).	0.2	\$400.00	\$ 80.00
09/14/2021	ZZA	Review correspondence from J. Morris regarding extended deadlines in notes litigation (.1).	0.1	\$400.00	\$ 40.00
09/14/2021	ZZA	Review court's order accepting report and recommendation in 3:21-cv-881 (.1);	0.1	\$400.00	\$ 40.00
09/15/2021	ZZA	Review notices of hearing on motions to compel and dismiss filed in notes cases (.2); calendar hearing on defendants' 12(b)(6) motions and motions to compel arbitration in notes actions and correspond with PSZJ team regarding same (.2).	0.4	\$400.00	\$ 160.00
09/23/2021	ZZA	Exchange correspondence with H. Winograd regarding issues related to HCM's forthcoming responses to motions to dismiss and motions to compel arbitration in notes actions (.2).	0.2	\$400.00	\$ 80.00

09/27/2021	ZZA	Review correspondence from H. Winograd regarding forthcoming responses to motions to dismiss and motions to compel arbitration in notes actions (.1).	0.1	\$400.00	\$ 40.00
09/28/2021	ZZA	exchange multiple correspondence with H. Winograd regarding issues related to and review of responses to motions to dismiss and motions to compel arbitration in notes actions (.2); review and revise HCM's response to motions to dismiss in notes actions and exchange correspondence with H. Winograd regarding revisions (.3); review and revise brief in support of HCM's response to motion to compel arbitration in notes actions and correspond with J. Morris regarding revisions (1.2); exchange correspondence with H. Winograd regarding HCM's brief in support of response to motions to dismiss (.1); review correspondence from J. Morris regarding his declaration in support of response (.1); review and revise HCM's brief in support of response to motions to dismiss in notes actions and correspond with H. Winograd regarding revisions (1.3); work on drafting, revising, finalizing, filing, and service of HCM's responses to motions to compel arbitration and motions to dismiss in notes actions (2.7).	5.9	\$400.00	\$ 2,360.00
10/02/2021	ZZA	Review multiple correspondence from J. Morris and H. Winograd regarding deposition notices to be served in notes litigation (.2).	0.2	\$400.00	\$ 80.00
10/04/2021	ZZA	Review, finalize, and file numerous notices of deposition and subpoena in notes actions (.6); multiple correspondence with A. Duarte providing instructions for service of notices (.2); exchange multiple correspondence with J. Morris regarding ECF issues and issues related to serving of deposition notices and subpoenas (.3).	1.1	\$400.00	\$ 440.00
10/08/2021	ZZA	Finalize and file amended notice of depositions to be taken in notes actions (.3); correspond with A. Duarte of KCC providing instructions for service of deposition notices (.1); exchange correspondence with J. Morris regarding filing and service of amended deposition notices (.1).	0.5	\$400.00	\$ 200.00
10/15/2021	ZZA	Review correspondence from J. Morris regarding issues related to discovery in notes actions (.1); review correspondence from J. Morris regarding issues related to notes defendants' discovery requests (.1).	0.2	\$400.00	\$ 80.00
10/26/2021	ZZA	Exchange correspondence with H. Winograd regarding correction to be made regarding brief in opposition to motion to dismiss in notes litigation (.2).	0.2	\$400.00	\$ 80.00
10/27/2021	ZZA	Exchange correspondence with H. Winograd regarding errata sheets to be filed in notes actions (.2).	0.2	\$400.00	\$ 80.00

10/28/2021	ZZA	Review and revise multiple deposition notices related to notes litigation and exchange correspondence with J. Morris regarding revisions and additional issues for consideration (.7); exchange multiple correspondence with H. Winograd regarding issues related to errata sheets to be filed related to briefs in opposition to motions to dismiss in notes actions (.2); finalize and file errata sheets to HCM's brief in opposition to motions to dismiss in notes actions (.2); exchange multiple correspondence with A. Duarte regarding instructions for service of errata sheets (.2);	1.3	\$400.00	\$ 520.00
10/29/2021	ZZA	Telephone conference with J. Morris regarding issues related to withdrawal of reference on notes cases (.4); review HCM's and HCRE's motions to extend expert disclosure and discovery deadlines in APs 21-3006 and 21-3007 (.2).	0.6	\$400.00	\$ 240.00
10/30/2021	ZZA	Work on analysis of issues related to pending report and recommendation regarding withdrawal of the reference in notes actions pursuant to telephone conference with J. Morris (1.0); exchange correspondence with J. Morris regarding remaining district court case where bankruptcy court's report and recommendation has not been adopted (.1).	1.1	\$400.00	\$ 440.00
10/31/2021	ZZA	Review email trail from H. Winograd regarding pending issues in notes actions (.2).	0.2	\$400.00	\$ 80.00
11/01/2021	ZZA	Finalize and file notice of subpoena served on D. Sauter in AP 21-3004 (.2); correspond with A. Duarte of KCC providing instructions for service of notice (.1); exchange follow-up correspondence with H. Winograd regarding notice of service of Sauter subpoena (.1); finalize and file amended notice of deposition of HCMFA in AP 21-3004 (.2); correspond with A. Duarte providing instructions for service of deposition notice (.1).	0.7	\$400.00	\$ 280.00
11/05/2021	ZZA	Review replies in support of defendants' motions to compel arbitration and stay proceedings in notes litigation (.3); review replies in support of defendants' motions to dismiss in notes litigation (.3); review defendants' witness and exhibit list for hearing on motions to dismiss, motions to compel arbitration, and motions to stay filed in notes litigation (.3).	0.9	\$400.00	\$ 360.00
11/08/2021	ZZA	Review notice of hearing on NPA's motion to extend expert deadlines in AP 21-3005 (.1); review notices of hearing on HCM's and HCRE's motions to extend deadlines in APs 21-3006 and 21-3007 (.2).	0.3	\$400.00	\$ 120.00
11/09/2021	ZZA	Attend hearing on motions to compel arbitration and motion to dismiss certain claims in notes litigation pending in bankruptcy court (3.5).	3.5	\$400.00	\$ 1,400.00
11/11/2021	ZZA	Calendar multiple upcoming deadlines related to notes litigation and pending appeals and correspond with PSZJ team regarding same (.2).	0.2	\$400.00	\$ 80.00

11/12/2021	ZZA	Review clerk's notes on hearings held in notes litigation (.2); review court's informal bench ruling on matters heard 11/9 in notes litigation (.3).	0.5	\$400.00	\$ 200.00
11/19/2021	ZZA	Review and revise proposed stipulation regarding experts in notes litigation and correspond with H. Winograd regarding revisions and preparation of order approving stipulation (.3); review correspondence from J. Morris regarding parties' consent to stipulation regarding expert deadlines in notes litigation (.1); review and revise proposed order approving stipulation regarding expert deadlines (.2); review multiple correspondence from H. Winograd regarding issues related to stipulation about expert deadlines in notes litigation (.1); finalize and file stipulations in APs 21-3005, 21-3006, and 21-3007 regarding expert deadlines (.2); exchange multiple correspondence with A. Duarte regarding instructions for service of stipulations (.2); finalize and file proposed orders approving stipulations in notes litigation and multiple correspondence to T. Ellison advising of filing of stipulations and submission of proposed orders thereon (.3); exchange correspondence with J. Morris regarding issues related to scheduling order on summary judgment motions in notes litigation (.2).	1.6	\$400.00	\$ 640.00
11/22/2021	ZZA	review multiple notices from clerk's office regarding issues related to proposed orders submitted in notes litigation (.1); multiple correspondence with H. Winograd, M. Hayward, and M. Holmes regarding issues related to proposed orders on stipulations regarding briefing and hearing schedules in notes litigation and possible fixes for same (.6).	0.7	\$400.00	\$ 280.00
11/30/2021	ZZA	Review court's orders approving stipulations in notes cases and correspond with A. Duarte providing instructions for service of same (.4); review HCMFA's second motion for leave to amend answer in AP 21-3004 and provide copy of same to PSZJ team (.6); review HCMFA's appendix in support of motion and provide copy of same to PSZJ team (.2);	1.2	\$400.00	\$ 480.00
12/01/2021	ZZA	Review HCMFA's proposed second amended answer filed in AP 21-3004 (.3); review multiple correspondence from clerk issued in 21-3003 and 21-3005 regarding need for defendants to submit proposed orders (.2); review clerk's correspondence in AP 21-3006 requesting order (.1); review clerk's correspondence in AP 21-3007 requesting order on motion (.1); finalize and file debtor's response to motions to extend discovery, brief in support, and declaration of J. Morris in APs 21-3005, 21-3006, and 21-3007 (.4); exchange multiple correspondence with A. Duarte regarding instructions for service of filed documents (.3);	1.4	\$400.00	\$ 560.00
12/02/2021	ZZA	correspond with PSZJ team providing them with supplemental documents filed in AP 21-3004 (.1); review HCMFA's appendix in support of motion for leave to file second amended answer (.1).	0.2	\$400.00	\$ 80.00

12/03/2021	ZZA	<p>Exchange correspondence with J. Morris regarding hearing transcripts in AP 21-3003 (.2); review correspondence from M. Holmes regarding hearing transcript in AP 21-3003 (.1); review multiple correspondence from J. Morris, L. Canty, H. Winograd, and G. Demo regarding pleadings and exhibits related to forthcoming motion to consolidate notes actions (.4); review and revise brief in support of motion to consolidate notes actions and correspond with J. Morris regarding revisions (1.1); review correspondence from H. Winograd regarding revisions to brief in support of motion to consolidate notes actions (.1); review and revise motion to consolidate notes actions and correspond with H. Winograd regarding revisions (.3); review memorandum opinion and order denying motions to compel arbitration and stay litigation filed in notes actions (.5);</p> <p>correspond with PSZJ team providing compressed copy of HCMFA's appendix filed in AP 21-3004 (.1); review correspondence from H. Winograd regarding further revisions to be made to motion to consolidate notes (.2); review and revise proposed order granting motion to consolidate notes actions and correspond with H. Winograd regarding revisions (.3); exchange correspondence with H. Winograd regarding issues related to appendix to be filed with motion to consolidate (.2);</p>	3.5	\$400.00	\$ 1,400.00
12/04/2021	ZZA	Review correspondence from J. Morris regarding forthcoming motion to consolidate notes actions (.1).	0.1	\$400.00	\$ 40.00
12/05/2021	ZZA	Review multiple correspondence from D. Deitsch-Perez and J. Morris regarding motion to consolidate notes actions (.2).	0.2	\$400.00	\$ 80.00
12/06/2021	ZZA	Review correspondence from D. Deitsch-Perez regarding issues related to motion to consolidate notes actions (.1); review multiple correspondence from H. Winograd regarding documents related to motion to consolidate notes actions (.1).	0.2	\$400.00	\$ 80.00

12/07/2021	ZZA	Work on finalizing documents for motion to consolidate notes actions and correspond with H. Winograd regarding same (.2); review multiple correspondence and documents received from L. Canty and H. Winograd regarding motion to consolidate notes actions (.2); work on revising proposed order on motion to consolidate notes actions and correspond with M. Holmes regarding revisions to same (.2); revise motion to consolidate notes actions and correspond with H. Winograd regarding further revisions (.2); review multiple correspondence from J. Morris regarding issues related to forthcoming motion to consolidate notes actions (.2); review orders denying motions to dismiss in APs 21-3003, 21-3005, 21-3006, and 21-3007 (.2); correspond with A. Duarte providing instructions for service of orders (.2); exchange multiple correspondence with H. Winograd, J. Morris, and G. Demo regarding issues related to forthcoming motion to consolidate notes actions (.5); review correspondence from J. Morris regarding filing of motion to consolidate notes actions (.1); revise certificate of conference on motion to consolidate and correspond with J. Morris regarding revisions (.2); finalize and file motion to consolidate notes actions, brief in support, and appendix in support (.3); correspond with A. Duarte providing instructions for service of documents related to motion to consolidate (.1); correspond with chambers of Judge Brown providing copy of proposed order on motion to consolidate notes actions (.2); review correspondence from J. Pomerantz regarding issues related to motion to consolidate notes actions (.1).	2.9	\$400.00	\$ 1,160.00
12/07/2021	ZZA	Review court's order denying motion for reconsideration in 3:21-cv-1378 (.2); correspond with A. Duarte providing instructions for service of order on motion for reconsideration (.1);	0.3	\$400.00	\$ 120.00
12/08/2021	ZZA	Correspond with PSZJ team providing copies of replies filed in notes cases earlier today (.1);	0.1	\$400.00	\$ 40.00
12/09/2021	ZZA	Exchange multiple correspondence with G. Demo, L. Canty, and H. Winograd regarding issues related to preparations for upcoming WebEx hearing on discovery and expert motions in notes cases (.5); review amended notice of hearing regarding expert motion in AP 21-3005 (.1);	0.6	\$400.00	\$ 240.00
12/10/2021	ZZA	Exchange multiple correspondence with D. Klos regarding upcoming hearing on expert/discovery motions in notes actions (.2);	0.2	\$400.00	\$ 80.00
12/11/2021	ZZA	Review expert report of Steven Pully filed in AP 21-3005 (.6); review defendants' motions to consolidate notes cases pending in the NDTX (.5); multiple correspondence with PSZJ team providing them with file-stamped copies of motions to consolidate, briefs in support, and appendices in support filed in district court notes cases (.5); review multiple correspondence from J. Morris and H. Winograd regarding issues related to defendants' motions to consolidate notes cases (.2).	1.8	\$400.00	\$ 720.00
12/13/2021	HOL	prepare requests for 12/13 hearings in 21-3005, 21-3006, and 21-3007, email correspondence regarding same (0.3).	0.3	\$195.00	\$ 58.50

12/13/2021	ZZA	Review multiple correspondence from J. Morris regarding draft notice of motion to consolidate notes actions in district court (.3); revise notice of motion to consolidate notes actions and correspond with J. Morris regarding issues related to same (.3); exchange correspondence with J. Morris regarding deadlines related to motions to consolidate notes actions (.2); review revised notice of motion to consolidate notes actions received from J. Morris (.1); review correspondence from J. Pomerantz regarding issues related to notice of motion to consolidate notes actions (.1); correspond with J. Pomerantz and J. Morris regarding issues related to notice of motion to consolidate notes actions (.1); attend hearing on defendants' motions to extend expert and discovery deadlines in APs 21-3005, 21-3006, and 21-3007 (1.4); review follow-up correspondence from J. Morris regarding notice of motion to consolidate (.1); exchange additional correspondence with J. Pomerantz and J. Morris regarding notice of motion to consolidate (.2); further revision of notice of motion to consolidate notes actions and correspond with J. Morris regarding same (.2); finalize and file notice of motion to consolidate notes actions in district court cases (.2); multiple correspondence with A. Duarte providing instructions for service of notices (.2); follow-up correspondence with J. Morris regarding filing and service of notices (.1); review multiple correspondence from H. Winograd and J. Morris regarding proposed order denying motion to extend discovery deadlines (.3); revise proposed order denying motions to extend expert disclosure and discovery deadlines and exchange correspondence with H. Winograd regarding revisions (.2); review multiple follow-up correspondence from J. Pomerantz and J. Morris regarding revisions to proposed order on expert and discovery deadlines (.1); review correspondence and proposed forms of order submitted by D. Deitsch-Perez, counsel for defendants, in district court	4.6	\$400.00	\$ 1,840.00
12/14/2021	ZZA	Calendar deadline to file response to motion to consolidate notes actions and correspond with PSZJ team regarding same (.1);	0.1	\$400.00	\$ 40.00
12/16/2021	MSH	Exchange email regarding MSJs and filing preparations (.30); review HCMFA objection to motion to consolidate note actions (.10); review order reassigning DC cases to Starr (.10).	0.5	\$450.00	\$ 225.00
12/16/2021	ZZA	Review notices of appeal of orders on motions to compel filed in notes actions (.4); review HCMFA's objection and appendix in response to motion to consolidate district court notes cases and correspond with PSZJ team regarding same (.5);	0.9	\$400.00	\$ 360.00
12/16/2021	ZZA	Review multiple correspondence from A. Duarte and J. Morris regarding service issues related to forthcoming summary judgment motion (.1); review order reassigning 3:21-cv-880 to Judge Starr and correspond with PSZJ team regarding same (.2); correspond with J. Morris regarding issues related to filing and service of forthcoming summary judgment motion (.2); correspond with A. Duarte providing instructions for service of order in 3:21-cv-880 (.1); review order reassigning case 3:21-cv-1010 to Judge Starr and correspond with PSZJ team regarding same (.1); correspond with A. Duarte providing instructions for service of order in 3:21-cv-1010 (.1); review multiple correspondence from J. Morris and L. Canty regarding forthcoming motion for summary judgment and exhibits thereto (.2); correspond with M. Hayward and M. Holmes regarding logistical issues related to filing of forthcoming motion for summary judgment (.1);	1.1	\$400.00	\$ 440.00
12/17/2021	MSH	Exchange email regarding MSJs, stipulation regarding exhibits, and finalization and filing of same (.60).	0.6	\$450.00	\$ 270.00



12/17/2021	ZZA	Review multiple correspondence from L. Canty and M. Holmes regarding exhibits to motions for summary judgment in notes actions (.3); correspond with M. Holmes regarding preparation of exhibits for filing in connection with summary judgment motions in notes actions (.1); exchange correspondence with H. Winograd regarding issues related to motion for summary judgment in notes actions (.2); review multiple correspondence from L. Canty regarding summary judgment exhibits (.1); exchange correspondence with J. Morris regarding issues related to possible need to seal certain exhibits to MSJ in notes actions (.2); review multiple notices from clerk regarding appeals filed in notes actions (.3); work on drafting, reviewing, revising, finalizing, filing, and service of motions for partial summary judgment and ancillary documents in notes actions (8.7).	9.9	\$400.00	\$ 3,960.00
12/18/2021	MSH	Email from H. Winograd regarding amendment to MSJ to correct appx and list of parties, definitions, and witnesses (.10).	0.1	\$450.00	\$ 45.00
12/18/2021	ZZA	Continue work on finalizing and filing appendix with exhibits in support of motions for partial summary judgment in notes actions (2.5); review correspondence from A. Duarte regarding document service issues regarding motions for summary judgment (.1); review and revise draft errata sheet related to MSJ in notes actions and exchange correspondence with H. Winograd regarding same (.4); exchange correspondence with J. Morris regarding errata sheet related to MSJ in notes actions (.1).	3.1	\$400.00	\$ 1,240.00
12/20/2021	MSH	Exchange email regarding amended MSJ brief and exhibits and filing of same (.30);	0.3	\$450.00	\$ 135.00
12/20/2021	ZZA	Work on finalizing, filing, and service of amended briefs in support of summary judgment motions and notices of filing of same in notes actions (1.1); review correspondence from J. Morris regarding amended briefs filed in notes actions (.1); review correspondence from T. Ellison inquiring about hearing setting for summary judgment motions in notes actions (.1); review multiple correspondence from A. Duarte regarding issues related to service of documents filed in notes actions (.2); correspond with J. Morris providing file-stamped copies of briefs filed in notes actions (.1); exchange multiple correspondence with J. Morris regarding scheduling of hearing on MSJs in notes actions (.2); correspond with T. Ellison regarding hearing setting on MSJs in notes actions (.1); review multiple correspondence from H. Winograd and J. Morris regarding stipulation in AP 21-3004 (.1); revise stipulation in AP 21-3004 and correspond with H. Winograd regarding revisions (.2).	2.0	\$400.00	\$ 800.00

12/21/2021	ZZA	Review multiple correspondence from T. Ellison and J. Morris regarding possible hearing setting for summary judgment motions in notes actions (.2); review clerk's notices regarding appeal in AP 21-3006 (.1); review, finalize, and upload proposed orders denying motions to extend expert disclosure and discovery deadlines in notes actions and correspond with T. Ellison advising of submission of orders (.3); review correspondence from D. Deitsch-Perez and J. Morris regarding hearing setting on PMSJ in notes actions (.1); correspond with T. Ellison regarding hearing setting for PMSJ in notes actions (.1); review and revise proposed order approving stipulation and briefing schedule in AP 21-3004 and correspond with H. Winograd regarding same (.2); review correspondence from T. Ellison regarding hearing availability for hearing PMSJ in notes actions (.1); finalize and file stipulation on briefing schedule in AP 21-3004 (.2); correspond with A. Duarte providing instructions for service of stipulation (.1); finalize and upload proposed order approving stipulation in AP 21-3004 and correspond with T. Ellison regarding submission of same (.2);	1.6	\$400.00	\$ 640.00
12/22/2021	ZZA	Prepare notice of hearing on motions for summary judgment in notes actions and correspond with J. Morris regarding same (.4); review orders denying motions to extend expert disclosure and discovery deadlines entered in notes actions and correspond with A. Duarte of KCC providing instructions for service of orders (.2); finalize and file notices of hearing on motions for summary judgment in notes actions and correspond with A. Duarte providing instructions for service of notice (.3); calendar hearing on motions for summary judgment in notes actions and correspond with PSJ	1.0	\$400.00	\$ 400.00
12/23/2021	ZZA	Review clerk's notices regarding appeal of order on motion to compel in AP 21-3007 (.2); review court's order approving stipulation and briefing schedule in AP 21-3004 (.1); correspond with A. Duarte providing instructions for service of order (.1);	0.4	\$400.00	\$ 160.00
12/27/2021	ZZA	Calendar multiple upcoming deadlines in AP 21-3004 and correspond with PSJ team regarding same (.2); review multiple correspondence from J. Morris and H. Winograd regarding reply to be filed in support of motion to consolidate notes actions in district court (.1); review and revise HCM's draft reply in support of motion to consolidate notes actions in district court and exchange correspondence with J. Morris regarding revisions (.4); review HCMFA's notices of filed objections regarding case consolidation filed in 3:21-cv-880, 3:21-cv-881, 3:21-cv-1378, and 3:21-cv-1379 (.4); review and revise current version of HCM's draft reply in support of motion to consolidate notes actions in district court and correspond with J. Morris regarding revisions (.3); review multiple correspondence from J. Morris and J. Pomerantz regarding further revisions to HCM reply, further revise reply, and correspond with J. Morris regarding updated version of reply (.3); exchange correspondence with J. Morris and H. Winograd regarding approval to file reply (.1); finalize and file replies in support of HCM's motions to consolidate notes actions in district court (.3); multiple correspondence with A. Duarte providing instructions for service of replies (.2); review follow-up correspondence from A. Duarte regarding service of replies (.1);	2.4	\$400.00	\$ 960.00

12/29/2021	ZZA	Review correspondence from H. Winograd regarding forthcoming response to HCMFA's second motion for leave to amend answer in AP 21-3004 (.1).	0.1	\$400.00	\$ 40.00
12/30/2021	MSH	Exchange email regarding response to HCMFA motion (.10); review objection to HCMFA motion to amend answer (.20).	0.3	\$450.00	\$ 135.00
12/30/2021	ZZA	Review multiple correspondence from J. Morris regarding issues related to response to HCMFA's second motion for leave to amend answer in AP 21-3004 (.2); exchange multiple correspondence with H. Winograd regarding issues and tasks to be completed related to HCM's response to HCMFA's motion for leave (.2); review and revise draft brief in response to HCMFA's motion for leave and correspond with J. Morris regarding revisions (1.1); review appellants' record designations in appeals denying arbitration request in APs 21-3003, 21-3005, 21-3006, and 21-3007 (.4); prepare response to HCMFA's motion for leave and correspond with H. Winograd regarding same (.3); exchange correspondence with H. Winograd regarding issues related to appendix to response to HCMFA's motion for leave (.3); review and revise H. Winograd declaration in support of response (.2); review multiple correspondence from J. Morris and D. Rukavina regarding short extension of time to file response to HCMFA's motion for leave (.2); work on finalizing and filing of HCM's response, brief, and appendix in opposition to HCMFA's second motion for leave to amend answer in AP 21-3004 (.8); exchange multiple correspondence with A. Duarte regarding instructions for service of response, brief, and appendix (.2);	3.9	\$400.00	\$ 1,560.00
01/02/2022	ZZA	Review stipulation with NexPoint regarding affirmative defense in AP 21-3005 (.1).	0.1	\$400.00	\$ 40.00
01/04/2022	ZZA	Review clerk's correspondence seeking amended record designation from defendants in AP 21-3003 (.1);	0.1	\$400.00	\$ 40.00
01/05/2022	ZZA	Review NexPoint's objection to bankruptcy court's order denying motions to extend expert disclosure and discovery deadlines filed in 3:21-cv-880 (.5); review defendants' amended record designations regarding appeal of arbitration issue filed in notes cases (.4); review NexPoint's notice filed in AP 21-3005 regarding documents filed in district court case (.1); correspond with PSZJ team regarding NexPoint notice filed in AP 21-3005 (.1); review HCMSI's and HCRE's objections filed in 3:21-cv-1378 and 3:21-cv-1379 to bankruptcy court order denying motions to extend expert and discovery deadlines and corresponding notices filed in AP 21-3006 and 21-3007 (.4);	1.5	\$400.00	\$ 600.00
01/06/2022	ZZA	Review district court orders consolidating all notes cases before Judge Starr (.1); lengthy correspondence with A. Duarte regarding service of order consolidating notes cases in district court and service issues related to same (.2);	0.3	\$400.00	\$ 120.00
01/07/2022	ZZA	Exchange correspondence with H. Winograd regarding issues related to forthcoming responses to motions for reconsideration in 3:21-cv-880 and 3:21-cv-1378 (.2); review analysis of issues related to motions for reconsideration in 3:21-1378 and 3:21-cv-880 received from H. Winograd (.2);	0.4	\$400.00	\$ 160.00
01/10/2022	ZZA	Attend hearing on HCMFA's second motion for leave to amend answer in AP 21-3004 (4.7);	4.7	\$400.00	\$ 1,880.00

01/11/2022	ZZA	Review correspondence from J. Morris regarding extension of deadline for defendants to respond to motions for summary judgment in notes actions (.1);	0.1	\$400.00	\$ 40.00
01/12/2022	ZZA	review proposed Revisions to stipulation regarding notes msj briefing schedule received from J. Morris (.1); review finalized stipulations regarding notes msj briefing schedule filed in notes actions (.2);	0.3	\$400.00	\$ 120.00
01/13/2022	ZZA	Exchange correspondence with PSZJ team regarding filing of supplemental record designations in appeals of arbitration orders in notes actions (.2); calendar deadlines related to pending MSJs in notes actions and correspond with PSZJ team regarding same (.2); review, finalize, and file HCM's supplemental record designations in appeals of orders denying arbitration in notes actions (.3);	0.7	\$400.00	\$ 280.00
01/14/2022	ZZA	Review NexPoint's motion for ruling on pending objections in consolidated cases filed in 3:21-cv-881 (.2); review proposed order on NexPoint's motion for ruling on pending objections received from J. Vasek (.1);	0.3	\$400.00	\$ 120.00
01/19/2022	MSH	Review HCMFA brief in opposition to MSJ (.20).	0.2	\$450.00	\$ 90.00
01/19/2022	ZZA	Review emergency motions for leave to exceed page limits in defendants' response to HCM's motions for summary judgment in notes actions and motions for expedited consideration of same (.3); review HCMFA's response to HCM's motion for partial summary judgment in notes actions (.7).	1.0	\$400.00	\$ 400.00
01/20/2022	MSH	Review responses filed in note proceedings in response to MSJs (.20);	0.2	\$450.00	\$ 90.00
01/20/2022	ZZA	Review correspondence from J. Morris regarding possibility of moving hearing on partial summary judgment motions in notes actions (.1); correspond with T. Ellison regarding court availability for new hearing date on motions for summary judgment in notes actions if necessary (.1); exchange follow-up correspondence with T. Ellison regarding possible new hearing dates for PMSJs in notes actions (.1); review amended agreed emergency motions to exceed page limits filed notes actions (.2);	0.5	\$400.00	\$ 200.00
01/21/2022	ZZA	Review district court's orders consolidating notes cases pending before it (.2); review defendants' responses to motions for partial summary judgment in notes actions 21-3003, 21-3005, 21-3006, and 21-3007 (1.5); review notices of stipulation consolidating and staying briefing of appeal of orders denying motions to compel arbitration filed in APs 21-3005, 21-3006, and 21-3007 (.2);	1.9	\$400.00	\$ 760.00
01/21/2022	ZZA	Review Dondero's motion for entry of order on pending motion filed in 3:21-cv-881 (.1);	0.1	\$400.00	\$ 40.00
01/24/2022	ZZA	Review court's orders granting motions to exceed page limits for responses to PMSJs in notes actions (.2);	0.2	\$400.00	\$ 80.00
01/24/2022	ZZA	Review correspondence from H. Winograd regarding forthcoming stipulation in 3:21-cv-881 (.1);	0.1	\$400.00	\$ 40.00
01/25/2022	ZZA	Review correspondence from J. Morris regarding scheduling of hearing on PMSJs in notes actions (.1);	0.1	\$400.00	\$ 40.00
01/25/2022	ZZA	Review and revise stipulation regarding briefing schedule in 3:21-cv-881 and exchange correspondence with H. Winograd regarding same (.3);	0.3	\$400.00	\$ 120.00

01/26/2022	ZZA	Review correspondence from M. Aigen regarding defendants' availability for hearing on PMSJ in notes actions (.1); exchange correspondence with J. Morris regarding preparation of amended notice of hearing on PMSJs in notes actions (.1); correspond with T. Ellison regarding hearing time for hearing on PMSJs in notes actions (.1); review correspondence from T. Ellison regarding issues relating to new hearing date for hearing on PMSJs in notes actions (.1);	0.4	\$400.00	\$ 160.00
01/26/2022	ZZA	Exchange correspondence with H. Winograd and J. Morris regarding issues related to forthcoming response to motions refiled in 3:21-cv-881 (.2);	0.2	\$400.00	\$ 80.00
01/27/2022	ZZA	Review correspondence from T. Ellison regarding need for filing of motion to continue hearing on PMSJs in notes actions (.1);	0.1	\$400.00	\$ 40.00
01/31/2022	ZZA	Review correspondence from H. Winograd regarding forthcoming objection to NexPoint's motion for reconsideration in 3:21-cv-881 (.1); review multiple correspondence from H. Winograd regarding status of response to motion to reconsider in 3:21-cv-881 (.1); review, revise, finalize, and file HCM's response in opposition to motion to reconsider bankruptcy court order in 3:21-cv-881, and exchange numerous correspondence with PSJ team regarding revisions (1.3); exchange multiple correspondence with A. Duarte regarding instructions for service of response (.2); exchange correspondence with H. Winograd regarding issues related to filing and service of response in 3:21-cv-881 (.1);	1.8	\$400.00	\$ 720.00
02/01/2022	ZZA	Exchange correspondence with H. Winograd regarding issues related to HCM's response to HCMFA's motion for reconsideration in 3:21-cv-881 (.2);	0.2	\$400.00	\$ 80.00
02/04/2022	ZZA	Review correspondence from J. Morris regarding forthcoming replies in support of PMSJs (.1); exchange correspondence with A. Duarte regarding service issues related to forthcoming replies in support of PMSJs in notes actions (.2); correspond with J. Morris regarding issues related to forthcoming replies to be filed in notes actions (.1);	0.4	\$400.00	\$ 160.00
02/06/2022	ZZA	Review draft brief on motion to strike and for sanctions and contempt to be filed in notes actions and multiple correspondence from J. Morris regarding issues related to same (.5); review multiple correspondence from G. Demo, J. Morris, and J. Pomerantz regarding motion to strike (.2); exchange multiple correspondence with J. Morris regarding issues related to motion to strike and for sanctions and contempt (.3); review correspondence from J. Pomerantz regarding content of motion to strike and for sanctions and contempt (.1).	1.1	\$400.00	\$ 440.00
02/07/2022	HOL	Work on omnibus motion, email correspondence with Z. Annable regarding same (0.3).	0.3	\$195.00	\$ 58.50
02/07/2022	MSH	Review reply ISO MSJ in note litigation (.30).	0.3	\$450.00	\$ 135.00

02/07/2022	ZZA	Review current draft brief on motion to strike and correspondence from H. Winograd regarding issues related to same (.4); review redline of current draft of brief on motion to strike and for sanctions and for contempt (.3); review multiple correspondence from J. Morris and H. Winograd regarding call to discuss status of pleadings for filing (.2); prepare motion to strike and for contempt and sanctions and proposed order thereon and correspond with J. Morris regarding issues related to same (1.0); telephone conference with PSZJ attorneys regarding issues related to replies in support of PMSJs in notes actions and motion to strike (.4); work on reviewing, revising, finalizing, filing, and service of motion to strike and for sanctions and for contempt and related documents as well as reply brief in support on PMSJs in notes actions (6.1);	8.4	\$400.00	\$ 3,360.00
02/08/2022	ZZA	Exchange multiple correspondence with J. Morris regarding issues related to obtaining hearing on motion to strike, response deadlines related to same, and hearing on PMSJs (.4);	0.4	\$400.00	\$ 160.00
02/09/2022	ZZA	Exchange multiple correspondence with T. Ellison regarding need for motion continuing hearing on PMSJs in notes actions (.2); prepare motion to continue hearing on PMSJs in notes actions and proposed order granting motion and correspond with J. Morris regarding same (.7); exchange multiple correspondence with J. Morris regarding revisions to motion to continue hearing on PMSJs in notes actions (.2); finalize and file motions to continue hearing on PMSJs in notes actions and upload proposed orders approving continuance (.4); exchange multiple correspondence with A. Duarte regarding instructions for service of motions (.2); multiple correspondence with T. Ellison regarding filing of motions for continuance of hearing on PMSJs in notes actions and submission of proposed orders regarding same (.2);	1.9	\$400.00	\$ 760.00
02/10/2022	ZZA	Correspond with T. Ellison requesting hearing setting on motions to strike and for sanctions and contempt filed in notes actions (.2); review correspondence from T. Ellison approving hearing of motions to strike at same time as PMSJs in notes actions (.1); exchange multiple correspondence with J. Morris regarding issues related to motions to strike filed in notes actions (.2); correspond with T. Ellison clarifying which notes actions motions to strike were filed in (.2);	0.7	\$400.00	\$ 280.00

02/11/2022	ZZA	Review order continuing hearing on PMSJs in notes actions (.1); calendar new hearing date for PMSJs in notes actions and correspond with PSZJ team regarding same (.1); prepare notice of hearing on motions to strike filed in notes actions and correspond with J. Morris regarding same (.4); exchange follow-up correspondence with J. Morris regarding issues related to motions to strike filed in notes actions (.1); review correspondence from H. Winograd regarding issues related to notice of hearing on motions to strike in notes actions (.1); finalize and file notices of hearing on motions to strike in notes actions (.2); exchange multiple correspondence with A. Duarte regarding instructions for service of notices of hearing in notes actions (.2); correspond with T. Ellison inquiring as to status of additional orders continuing hearing on PMSJs in notes actions (.1); review correspondence from T. Ellison to clerk's office staff regarding entry of additional orders continuing hearing on PMSJs in notes actions (.1); review additional orders entered in notes actions continuing hearing on PMSJs and correspond with A. Duarte providing instructions for service of same (.4); exchange follow-up correspondence with M. Edmond regarding entry of orders continuing hearing on PMSJs in notes actions (.1);	1.9	\$400.00	\$ 760.00
02/14/2022	MSH	Review NexPoint reply regarding expert disclosure and discovery (.10).	0.1	\$450.00	\$ 45.00
02/14/2022	ZZA	Review NexPoint reply and supporting documents in support of motion to reconsider bankruptcy court order regarding expert and discovery deadlines filed in 3:21-cv-881 (.4); review HCMSI and HCRE joinder in NexPoint reply (.1);	0.5	\$400.00	\$ 200.00
02/15/2022	ZZA	Prepare amended notice of hearing on PMSJs in notes actions and correspond with PSZJ attorneys regarding same (.3); exchange multiple correspondence with J. Morris regarding issues related to amended notice of hearing (.2); review correspondence from G. Demo and H. Winograd regarding amended notice of hearing (.1); finalize and file amended notices of hearing on PMSJs in notes actions (.2); exchange multiple correspondence with A. Duarte regarding service of notices of hearing in notes actions (.2);	1.0	\$400.00	\$ 400.00
02/17/2022	ZZA	Finalize and file response to HCMFA's motion to reconsider, brief in support, and appendix in support in 3:21-cv-881 (.4); exchange multiple correspondence with A. Duarte regarding instructions for service of documents filed in 3:21-cv-881 (.2); correspond with H. Winograd providing file-stamped copies of response, brief, and appendix (.1);	0.7	\$400.00	\$ 280.00

02/18/2022	ZZA	Review multiple correspondence from H. Winograd, J. Morris, and L. Canty regarding correction needed to J. Morris declaration in support of motion to strike and for contempt (.2); exchange multiple correspondence with H. Winograd and J. Morris regarding issues related to correction to be made to exhibits attached to J. Morris declaration (.5); review and revise draft errata sheet regarding J. Morris declaration in support of motion to strike and for contempt and correspond with H. Winograd regarding revisions (.3); exchange multiple correspondence with J. Morris and L. Canty regarding sealing of exhibit in appendix to response to HCMFA's motion to reconsider and issues related thereto (.4); prepare draft correspondence to counsel for HCMFA regarding sealing of exhibit in appendix and exchange correspondence with J. Morris regarding revisions to draft correspondence (.5); review correspondence from H. Winograd and J. Morris approving revised errata sheet to be filed in notes actions (.1); finalize and file errata sheet to declaration of J. Morris in support of motion to strike filed in notes actions (.2); exchange correspondence with A. Duarte regarding instructions for service of errata sheets in notes actions (.2);	2.4	\$400.00	\$ 960.00
02/21/2022	MSH	Email from Z. Annable to counsel regarding filing of appendix exhibits under seal (.10).	0.1	\$450.00	\$ 45.00
02/21/2022	ZZA	Correspond with D. Rukavina and J. Vasek regarding issues related to sealing of HCMFA financial statement in HCM's appendix in support of response to HCMFA's motion to reconsider (.4);	0.4	\$400.00	\$ 160.00
02/24/2022	ZZA	Review correspondence from J. Morris regarding issues related to appendix in support of reply in support of PMSJs in notes actions (.1); research issues related to introduction of evidence in reply appendix in support of PMSJs in notes actions and provide multiple correspondence to J. Morris regarding analysis of same (1.8); exchange correspondence with M. Hayward regarding same (.1); exchange correspondence with J. Morris following up on issues related to introduction of evidence in reply appendix (.1); review multiple correspondence from J. Morris and H. Winograd regarding issues related to introduction of evidence in reply appendix in support of PMSJs in notes actions (.2); exchange correspondence with J. Morris regarding issues related to HCMFA's failure to respond to inquiries regarding sealing of exhibits related to motion for reconsideration (.2);	2.5	\$400.00	\$ 1,000.00
02/25/2022	MSH	Review motions to strike SJ reply appendix (.10).	0.1	\$450.00	\$ 45.00
02/25/2022	ZZA	Review multiple correspondence from J. Morris regarding communications with D. Rukavina related to sealing of exhibit in 3:21-cv-881 (.2); review motions to strike reply appendices and appendices in support filed in notes actions (.4); review notices of district court orders consolidating notes cases in case 3:21-cv-881 entered on docket in bankruptcy case (.2); correspond with J. Morris following up on sealing of exhibit in appendix to response to HCMFA's motion to reconsider (.1);	0.9	\$400.00	\$ 360.00
02/28/2022	MSH	Review responses to motion to strike and for sanctions for MSJ responses (.20);	0.2	\$450.00	\$ 90.00



02/28/2022	ZZA	Exchange correspondence with J. Morris regarding issues and deadlines related to defendants' motions to strike in notes actions (.2); review notice hearing on defendants' motion to strike in notes actions (.1); calendar hearing on defendants' motion to strike in notes actions and correspond with PSZJ team regarding same (.1); review notes defendants' objections to omnibus motion to strike and for sanctions and contempt filed in notes actions (1.1);	1.5	\$400.00	\$ 600.00
03/11/2022	ZZA	Exchange correspondence with H. Winograd regarding need for motion to extend page limits of reply in support of omnibus motion to strike and for sanctions and contempt (.2); exchange follow-up correspondence with J. Morris and H. Winograd regarding motion to extend page limits of reply and issues with PACER availability (.2);	0.4	\$400.00	\$ 160.00
03/13/2022	ZZA	Review correspondence from H. Winograd regarding draft motion to file reply in excess of page limits in support of omnibus motion to strike (.1);	0.1	\$400.00	\$ 40.00
03/14/2022	ZZA	Review and revise motion to file reply in excess of page limits in support of omnibus motion to strike, prepare proposed order on same, exchange multiple correspondence with H. Winograd regarding revisions to documents, finalize and file motions and proposed in notes actions, and correspond with A. Duarte of KCC providing instructions for service of motions (1.0); correspond with T. Ellison and M. Edmond regarding filing of motions to exceed page limits and submission of orders regarding same (.2); review follow-up correspondence from M. Edmond regarding proposed orders submitted on motions to file reply in excess of page limits in notes actions (.1); review multiple correspondence from H. Winograd, J. Morris, and L. Canty regarding hearing on defendants' motion to strike PMSJ evidence (.1); review and revise draft reply in support of omnibus motion to strike in notes actions and J. Morris declaration in support of same and correspond with H. Winograd regarding revisions (.6); review revised reply in support of omnibus motion to strike received from H. Winograd (.1); finalize and file replies and Morris declarations in support of omnibus motions to strike in notes actions (.4); exchange correspondence with A. Duarte regarding instructions for service of replies and declarations (.3); correspond with H. Winograd regarding filing of replies and declarations and service of same (.1);	2.9	\$400.00	\$ 1,160.00
03/15/2022	ZZA	Exchange multiple correspondence with H. Winograd regarding issues related to defendants' motions to strike PMSJ evidence in notes actions (.3);	0.3	\$400.00	\$ 120.00

03/18/2022	ZZA	Review correspondence from H. Winograd regarding forthcoming response to defendants' motions to strike evidence in notes actions (.1); review and revise response to defendants' motions to strike and correspond with H. Winograd regarding revisions (.2); review follow-up correspondence from H. Winograd regarding brief and appendix in support of response to defendants' motions to strike (.1); review and revise current draft response to motions to strike and appendix in support and correspond with H. Winograd regarding revisions (.2); review and revise brief in support of response to defendants' motions to strike evidence in notes actions and correspond with H. Winograd regarding revisions (.7); review and revise updated draft of brief in support of response to defendants' motions to strike and correspond with H. Winograd regarding revisions (.4); finalize and file responses to defendants' motions to strike evidence in notes actions, briefs in support, and appendices in support (.4); exchange multiple correspondence with A. Duarte regarding instructions for service of responses, briefs, and appendices (.3); exchange correspondence with H. Winograd regarding filing and service of response (.1); review phv applications of J. Root in APs 21-3006 and 21-3007 (.1);	2.6	\$400.00	\$ 1,040.00
03/19/2022	ZZA	Review correspondence from J. Morris regarding issues related to upcoming hearing on PMSJs and motions to strike in notes actions (.1);	0.1	\$400.00	\$ 40.00
03/20/2022	ZZA	Review multiple correspondence from T. Ellison and J. Morris regarding court's availability for hearing on PMSJs in notes actions (.2);	0.2	\$400.00	\$ 80.00
03/21/2022	ZZA	Review multiple correspondence from J. Morris and T. Ellison regarding new hearing date of 4/20 for hearing on PMSJs in notes actions (.1); review and revise amended notice of hearing on PMSJs and exchange multiple correspondence with H. Winograd regarding revisions (.3); finalize and file amended notices of hearing on PMSJs in notes actions (.2); exchange multiple correspondence with A. Duarte regarding instructions for service of amended notices of hearing (.2);	0.8	\$400.00	\$ 320.00
03/22/2022	ZZA	Calendar new hearing dates in notes actions and correspond with PSZJ team regarding same (.2);	0.2	\$400.00	\$ 80.00
03/24/2022	ZZA	Review information received from J. Morris regarding request to recover attorneys' fees from defendants in notes actions (.2);	0.2	\$400.00	\$ 80.00
03/26/2022	ZZA	Review follow-up correspondence from J. Pomerantz and J. Morris regarding issues related to recovery of attorneys' fees from defendants in notes actions (.1);	0.1	\$400.00	\$ 40.00
03/28/2022	ZZA	Review court's order granting HCM's motion to exceed page limits in replies in notes actions (.1);	0.1	\$400.00	\$ 40.00
04/01/2022	ZZA	Review defendants' reply in support of motion to strike PMSJ evidence and appendix in support of reply (.4);	0.4	\$400.00	\$ 160.00
04/02/2022	ZZA	Review NexPoint's reply in support of motion to strike PMSJ evidence and appendix in support of reply (.1);	0.1	\$400.00	\$ 40.00

04/19/2022	ZZA	Review and revise notice of agenda of matters to be heard in notes actions on 4/20 and correspond with J. O'Neill regarding revisions (.5); review follow-up correspondence from J. O'Neill regarding revised hearing agenda (.1); finalize and file notice of agenda of matters to be heard in notes actions (.2); exchange multiple correspondence with A. Duarte regarding instructions for service of 4/20 hearing agenda (.2); correspond with T. Ellison regarding filing of notice of 4/20 hearing agenda and provide copy of same (.2); exchange correspondence with J. O'Neill regarding filing of hearing agenda and provide copy of same (.1);	1.3	\$400.00	\$ 520.00
04/20/2022	ZZA	Review correspondence from J. Morris regarding PowerPoint slides to be used at hearing today (.1); attend hearing on motions for partial summary judgment and motions to strike filed in notes actions (7.2);	7.3	\$400.00	\$ 2,920.00
04/22/2022	ZZA	Review and revise proposed order granting in part and denying in part HCM's omnibus motion to strike and for sanctions and for contempt and exchange multiple correspondence with J. Morris regarding revisions and additions to proposed order (1.0);	1.0	\$400.00	\$ 400.00
04/25/2022	ZZA	Exchange additional correspondence with J. Morris regarding issues related to draft proposed orders granting in part and denying in part HCM's motions to strike in notes actions (.3); finalize and submit proposed order granting in part and denying in part HCM's motions to strike in notes actions and correspond with T. Ellison advising of submission of same (.5);	0.8	\$400.00	\$ 320.00
04/27/2022	ZZA	Review court's orders granting in part and denying in part HCM's motions to strike in notes actions (.2);	0.2	\$400.00	\$ 80.00
07/19/2022	ZZA	Review court's report and recommendation with respect to PMSJs in notes actions (1.0); exchange multiple correspondence with A. Duarte regarding instructions for service of court's report and recommendation issued in notes actions (.2); correspond with PSZJ attorneys providing copies of court's report and recommendation entered in notes actions (.2);	1.4	\$400.00	\$ 560.00
<b>TOTAL</b>			<b>190.3</b>		<b>\$ 76,059.50</b>